

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

EMMA VINOKUR	:	CHAPTER 13
	:	
	:	
	:	
Debtor(s)	:	No. 15-15794 elf

**DEBTOR'S RESPONSE TO THE MOTION OF WILMINGTON SAVINGS FUND
SOCIETY D/B/A CHRISTIANA TRUST FOR RELIEF FROM THE AUTOMATIC STAY**

COMES NOW, EMMA VINOKUR, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-5. DENIED. The averments contained in these Paragraphs consist of mischaracterizations or summarizations of documents that speak for themselves and they are denied as no response is required.

6. DENIED. Debtor acknowledges she fell behind with post-petition mortgage payments when her husband suffered a loss of income due to the COVID-19 pandemic. However, Debtor believes she has made some post-petition payments that have not yet been credited. Debtor would like to enter into a Stipulation to cure the remaining balance.

7. DENIED. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded.

8. DENIED.

9. DENIED. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied, and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

October 29, 2020

Respectfully submitted,

Law Offices of Michele Perez Capilato

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